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KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Bureau of Waste Management

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PRMT SECTION

MEMORANDUM

TO: GM-CPC Fairfax I File
Kansas City, Kansas
EPA I.D. Number KSD007145899

THROUGH: John Paul Goetz, P.E., Chief
Hazardous Waste Section
Bureau of Waste Management JP

FROM: Brenda Clark BC

DATE: May 16, 1988

SUBJECT: Closure activities at drum storage yard

Closure Activities of March 25, 1988 (see photographs 1-12)

On March 25, 1988 I met with Bob Baird, Environmental Engineer for General Motors, and Pete Zanoni, Burns and McDonnell, to witness closure activities at the plant's drum storage yard. Clean-up procedures basically involved the removal of debris from the storage area and then the decontamination of the concrete pad itself.

Prior to my arrival that morning, workers had already swept the drum storage yard to remove all loose debris and had started steam-cleaning the concrete. The concrete was being cleaned by a combination of steam-cleaning and high-pressure washing; approximate water pressures of 1,000 to 1,500 psi were being used on the concrete. An emulsifier was also being applied to the concrete and scrubbed in prior to the final rinsing and steaming to help remove contaminants more thoroughly. All wash waters from cleaning activities were being directed into drains that lead to GM's on-site industrial wastewater treatment plant. The loose debris that had been swept up before beginning steam-cleaning activities had been placed into drums for disposal as hazardous waste.

Midwest Mechanical Contractors employees were performing the actual cleaning activities. HDR, Inc., based in Iowa, would be providing the P.E. closure certification. Two representatives of HDR, Mr. Bill Sigler, P.E., and Mr. Keith Potts were on-site. Mr. Sigler and Mr. Potts were also collecting samples that would be submitted to Langston Laboratories to determine the completeness of decontamination of the area.



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Several types of samples were collected. Prior to cleaning the pad, six borings were made through the pad into the soil at various locations. Samples of soil were collected at depths of 3.5 to 5 feet and 8 to 10 feet. These were to be analyzed for organics. Once samples had been collected, the drilling holes were filled and sealed with bentonite. After cleaning activities are complete, HDR will collect samples of concrete (concrete cores) at several locations on the pad to be tested for total heavy metals and E.P. Toxicity-heavy metals. Decontamination will also be verified by collecting and analyzing wipe samples of the concrete for the same parameters as the concrete cores.

Closure activities were not yet completed when I left the site. However, cleaning procedures appeared to be working effectively. In a brief discussion with Bob Baird before leaving, I explained that GM would need to submit both their certification and the P.E.'s certification within 60 days. I also notified Mr. Baird that I would be back to perform a final closure inspection of the site within the next few weeks. KDHE's decision on whether or not to accept GM's closure certification would be based both on the results of that inspection and the laboratory analyses of the samples collected during closure. He said if any questions arose during the preparation of the closure certification report he would call me.

Final Closure Inspection of April 10, 1988 (see photographs 13-23)

On the afternoon of April 20, 1988 I met with Bob Baird and we proceeded to GM's closed drum storage area.

Upon inspection, the concrete pad appeared to be fairly clean. The main area on the storage pad still showing staining was the section reserved for storage of non-hazardous waste oil. Photographs 13 and 16 show this area. Points where concrete cores had been taken were also viewed, see photograph 15. Except for some empty yellow salvage drums and cleaning equipment in a storage shed shown in photograph 22, the storage area was empty.

GM appeared to have done an effective job of cleaning residual contamination from the concrete pad. I explained to Mr. Baird that the pad overall looked clean, but KDHE would need to see laboratory results of the samples collected during closure before we could approve of or accept the pad's closure. Mr. Baird said that the report should be submitted within 3-4 weeks.

Conclusions: Overall, GM appears to have followed their approved closure plan. Except for some staining that remains in an area used to store non-hazardous waste oil, the pad was cleaned effectively.

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Recommendation: If laboratory analytical results on closure samples come back at acceptable levels, KDHE should approve of GM's closure certification. Residual staining from non-hazardous wastes should not be used as a reason to judge GM's closure as invalid.

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C Jim Fischer
 Wes Bartley ✓